MYY OFFICES

RITER, ROGERS, WATTIER & BROWN, LLP

Professional & Executive Building
319 South Coteau Street

P.O. Box 280 Pierre, South Dakota 57501-0280

www.riterlaw.com

ROBERT C. RITER, Jr. DARLA POLLMAN ROGERS JERRY L. WATTIER JOHN L. BROWN

MARGO D. NORTHRUP, Associate

TELEPHONE 605-224-5825 FAX 605-224-7102

OF COUNSEL: Robert D. Hofer E. D. Mayer

JUN 2 8 2016

June 28, 2006

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Patty Van Gerpen South Dakota Public Utilities Commission 500 East Capitol Avenue Pierre, South Dakota 57501

Re:

Beresford Municipal Telephone, Midstate Communications, Western Telephone

company and Roberts County's Applications for Extension of Deadline for Fil-

ing of 2006 Cost Studies

Dear Patty:

Please find enclosed herein for filing the original and ten (10) copies of Applications for Extension of Deadline for Filing of 2006 Cost Studies for the above named companies.

Sincerely yours,

Margo D. Worthrup Attorney at Law

MND/ea

Enclosures

cc:

Todd Hansen

Pamela Harrington Carmen Brown Tim Eklund Marlene Bennett

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BEFORE THE PUBLIC UTILITIES COMMISSION

JLH 2 8 2006

OF THE STATE OF SOUTH DAKOTA

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WESTERN TELEPHONE COMPANY APPLICATION FOR EXTENSION OF DEADLINE FOR FILING OF 2006 COST STUDY

Docket No.	

PETITION

Western Telephone Company ("Western") by and through its Attorney, Darla Pollman Rogers and Margo D. Northrup of Riter, Rogers, Wattier & Brown, LLP, respectfully requests that the South Dakota Public Utilities Commission ("Commission") allow Western to file a 2006 cost study after June 30, 2006, using calendar year 2005 as its historical test year. This Petition is based on the following grounds:

- 1. ARSD § 20:10:27:07 requires a carrier's carrier to file cost data in support of its switched access service tariff no less than once every three years, but the switched access rules do not prohibit a carrier from filing cost data in support of its switched access service tariff more frequently than once every three years.
- 2. ARSD § 20:10:27:14 requires carriers to file a cost study within six (6) months of the close of the test year upon which the carrier is relying to support a change in switched access rates. The rule also gives authority to the Commission to grant an extension of the six (6) month filing period, upon request of the carrier.
- 3. Western filed a cost study on or about June 29, 2005 (Docket TC05-091). Western wishes to preserve its option to file a 2006 cost study after the filing dead-line of June 30, 2006, but still use calendar year 2005 as the test year to support Western's 2006 cost study.

- 4. Western is requesting an extension of the six (6) month filing period, for the following reasons:
 - a. Western anticipates there will be a change in the intrastate switched access rules in the near future, either through new intercarrier compensation rules adopted by the FCC, or pursuant to the rule-making docket currently pending before this Commission. Western requests an extension of the six (6) month filing deadline for submitting its 2006 cost study until such time as there is a clearer indication of what will be required of carriers under the new switched access regime.
 - b. Western's 2005 cost study has not yet been resolved and is currently scheduled for hearing in September, 2006. Western's decision on whether to file a cost study in 2006 may be affected by the outcome of the pending 2005 docket.
 - c. Western will retain its current access rates, pending the outcome of the events in subparagraphs (a) & (b) above, or until Western files a 2006 cost study, pursuant to the granting of its request herein to extend the filing deadline.
- 5. Western is requesting an extension to December 31, 2006, to file a 2006 cost study, using calendar year 2005 as the test year to support Western's 2006 cost study.

WHEREFORE, Western respectfully requests the Commission to grant Western an extension of the six (6) month filing deadline for filing its 2006 cost study, to December 31, 2006, using calendar year 2005 as Western's test year.

Dated this 28th day of June, 2006.

Margo D. Northrup

Darla Pollman Rogers

Riter, Rogers, Wattier & Brown, LLP

P. O. Box 280

Pierre, South Dakota 57501

Telephone (605) 224-7889

Fax (605) 224-7102